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INTEROFFICE CORRESPONDENCE

DATE: March 7, 1991

CWAD-FDH-361-91

TO: A. H. Burlingame, Support Services, Bldg. 334

FROM: J. E. Evered, Environmental Restoration, Bldg T130B, Ext. 4934

SUBJECT: HERBICIDE/PESTICIDE ISSUE

This letter is to alert the appropriate personnel that the moratorium on any use of herbicides, pesticides or other such chemicals on the Rocky Flats Plant that went into effect May, 1990 is to continue until further notice.

Because of the potential of polluting the water courses which cross and drain the plantsite, chemicals normally used to control weeds must not be applied. This ban includes the remediation land east of Indiana Street, unless the land owner, Jefferson County, conducts the spraying program, thereby absolving the DOE or EG&G of the liability for potential pollution of any waters flowing into Mower Reservoir or Woman Creek.

Other means or combinations of weed control methods should be implemented on RFP land, such as burning, biological controls, grazing and mechanical methods. Plant Services has been provided with the proper application for permission to burn, which must be completed and submitted to the Colorado Department Health.

The U.S. Army Corp of Engineers has recommended that burning be used as the appropriate method of controlling the growth of vegetation in the drainage ditches and water courses. Field inspections by the Clean Water Act Division of ER indicate that the removal of vegetation in most of the water courses is long overdue. The overgrowth in the surface runoff control ditches is impeding the flow of runoff water and has increased pooling. This situation is increasing the potential of restricting the flow of water during a major precipitation event to the point of backing up waters and overflowing the embankments of the ditches.

The Remediation Programs Division of ER is investigating the use of selective weevils to control thistles and is in contact with the U. S. Department of Agriculture concerning this prospect. Grazing is also a recognized weed/vegetation control method. Goats are non-selective grazers and are successfully utilized by the Boulder Parks Department where chemical or mechanical controls are ineffective or undesirable.

Mechanical methods should also be used where practical. Even the water courses could be cut with the proper equipment, but the discarded cuttings would contribute to the ground cover and provide a fuel source which may increase the potential problem of grass fires. Burning would alleviate both problems.

The continued non-management of the Buffer Zone in regard to ground cover has allowed the ground litter to accumulate, and the fuel loading which would feed a grass fire is

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A-GW-001720

A. H. Burlingame
CWAD-FDH-361-91
March 7, 1991
Page 2

accumulating annually. Controlled burning and/or proper grazing are common practices utilized by various governmental agencies to reduce this hazard.

The Clean Water Act Division suggests a combined effort between the Fire Department and Plant Services summer personnel to conduct controlled burning. Another project might be to borrow or lease some goats or horses to graze selected areas under the supervision of summer employees. The Clean Water Act Division is very concerned with protection of the water courses by non-chemical means, and is cognizant of Federal, State and local laws (FEDERAL NOXIOUS WEED ACT, P.L. 93-629, SECTION 15, MANAGEMENT OF UNDESIRABLE PLANTS ON FEDERAL LANDS. COLORADO WEED MANAGEMENT ACT, C.R.S. 35-5.5-101, UNDESIRABLE PLANT MANAGEMENT) pertaining to the control of unwanted vegetation, i.e., those regulated as weeds.

If there are any questions or further assistance is needed, please contact D. S. Murray, CWAD, at ext. 5940, or M. Guillaume, Remediation Programs, ext. 4291.

DSM:vbs

cc.

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